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**Presentment Date: March 1, 2012 at 12:00 Noon**  
**Objection Deadline: February 29, 2012 at 4:00 p.m.**

Counsel for Motors Liquidation  
Company GUC Trust

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

MOTORS LIQUIDATION COMPANY,  
*et al.*,

Debtors.

)  
) Chapter 11  
)  
) Case No. 09-50026 (REG)  
)  
)  
) (Jointly Administered)  
)

**NOTICE OF PRESENTMENT OF PROPOSED STIPULATION AND  
AGREED ORDER RESOLVING PROOF OF CLAIM NUMBER 71242  
ASSERTED AGAINST THE REORGANIZED DEBTORS BY CHARTIS U.S.**

PLEASE TAKE NOTICE that the Motors Liquidation Company GUC Trust (the “**GUC Trust**”), formed by Motors Liquidation Company and its affiliated above-captioned reorganized debtors (collectively, “**MLC**”), and Chartis U.S. (“**Chartis**” and, together with MLC, the “**Parties**”), each by their undersigned counsel, will present the annexed Stipulation and Agreed Order Resolving Proof of Claim Number 71242 Asserted Against the Reorganized Debtors by Chartis U.S. (the “**Stipulation and Agreed Order**”) to the Honorable Robert E. Gerber, United States Bankruptcy Judge, in his Chambers, Room 527, at the United States Bankruptcy Court, One Bowling Green, New York, New York 10004, for signature on March 1, 2012 at 12:00 Noon (the “**Presentment Date**”).

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the proposed Stipulation and Agreed Order must be made in writing and received in Judge Gerber's Chambers, Room 627 of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004-1408, by February 29, 2012 at 4:00 p.m. ("**Objection Deadline**"). Unless objections are received by that time, the Stipulation and Agreed Order may be signed on the Presentment Date.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to General Order M-399<sup>1</sup>, any objection filed by parties with legal representation shall be filed on or before the Objection Deadline (i) through the Bankruptcy Court's Electronic Case Filing System ("ECF")<sup>2</sup> which may be accessed at the Bankruptcy Court's Internet web site at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), using Netscape Navigator software version 3.0 or higher, and (ii) in portable document format ("PDF") using Adobe Exchange software for conversion.

**PLEASE TAKE FURTHER NOTICE**, that any party that is either without legal representation or that is unable to file documents electronically shall file its objection on or before the Objection Deadline in .PDF format on a CD in an envelope clearly marked with the case name, case number, type and title of document, document number of the document to which the objection refers and the file name of the document.

**PLEASE TAKE FURTHER NOTICE**, that objections, if any, must be served in accordance with the provisions of General Order M-399 so that they are

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<sup>1</sup> Copies of General Order M-399 and the User's Manual for the Bankruptcy Court's Electronic Case Filing System are available at the official web site of the United States Bankruptcy Court for the Southern District of New York at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov).

<sup>2</sup> Filing documents on the ECF requires a password, which an attorney may obtain by contacting the Bankruptcy Court's technical assistance department at (212) 668-2870, ext. 3522, Monday through Friday, 8:30 a.m. to 5:00 p.m.

**received** on or before the Objection Deadline by (i) special counsel to Motors Liquidation Company GUC Trust, Togut, Segal & Segal, One Penn Plaza, Suite 3335, New York, New York, Attn.: Scott E. Ratner, Esq. and Richard K. Milin, Esq.; (ii) Zeichner, Ellman & Krause LLP, counsel for Chartis U.S., 575 Lexington Avenue, New York, New York 10022, Attn: Michael S. Davis, Esq.; (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, New York, New York 10004, Attn: Tracey Hope Davis, Esq.; (iv) Kramer Levin Naftalis & Frankel LLP, counsel to the Unsecured Creditors Committee, 1177 Avenue of the Americas, New York, New York 10036, Attn.: Thomas Moers Mayer, Esq. and Robert T. Schmidt, Esq.; (v) Gibson, Dunn & Crutcher, LLP, counsel to Wilmington Trust Company, 200 Park Avenue, 47<sup>th</sup> Floor, New York, New York 10166, Attn.: David M. Feldman, Esq., and Keith Martorana, Esq.; (vi) King & Spalding, LLP, counsel to General Motors LLC, 1185 Avenue of the Americas, New York, New York 10036, Attn.: Scott Davidson, Esq.; (vii) Lev L. Dassin, Acting United States Attorney for the Southern District of New York on behalf of the United States Department of Treasury, 86 Chambers Street, Third Floor, New York, New York 10007, Attn.: David S. Jones, Esq., Jeffrey S. Oestericher, Esq., Matthew L. Schwartz, Esq. and Joseph N. Cordaro, Esq., Assistant United States Attorneys; and (viii) any party in interest having filed a notice of appearance.

**PLEASE TAKE FURTHER NOTICE** that if no objections to the Stipulation and Agreed Order are timely filed, served and received in accordance with

the terms hereof, the Bankruptcy Court may enter an order approving the Stipulation and Agreed Order without further notice.

DATED: New York, New York  
February 16, 2012

MOTORS LIQUIDATION COMPANY  
GUC TRUST  
By its Counsel  
TOGUT, SEGAL & SEGAL LLP  
By:

/s/ Scott E. Ratner

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